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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

LIMA JEVREMOVIĆ, an individual; and
AUTONOMOUS USER REHABILITATION
AGENT, LLC, a Delaware Limited Liability
Company,

Plaintiffs,

vs.

BRITTANY JEREAM COURVILLE, an
individual,

Defendant.

Civil Action No:

Document Electronically filed

**AMENDED VERIFIED COMPLAINT
FOR:**

1. LIBEL

2. LIBEL

DEMAND FOR JURY TRIAL

Plaintiffs Lima Jevremović (“Ms. Jevremović”), an individual with her principal residence in the State of California, and Autonomous User Rehabilitation Agent, LLC, a limited liability company with its principal place of business in the State of Washington (“AURA” or the “Company”) (together, “Plaintiffs”), by and through their undersigned counsel, complaining of Defendant Brittany Jeream Courville (“Defendant” or “Courville”), allege as follows:

PARTIES

1. AURA is a limited liability company organized under the laws of Delaware, with its registered address and principal place of business located at 900 Winslow Way E Ste 300, Bainbridge Island, Washington 98110-2450. AURA operates as a wellness supplements and healthcare solutions software business. AURA’s members reside in the states of California, Colorado, Texas, Florida and Illinois, and in Australia.¹

2. Ms. Jevremović, an individual, is the founder and CEO of AURA. She identifies her address as: c/o Neville Johnson, Johnson & Johnson, LLP, 439 North Canon Drive, Suite 200, Beverly Hills, California, 90210 because she and her family have received harassment and threats in connection with the claims in this matter, and because her home address was disseminated (and unknown third parties have attempted to gain entry while the family was home), Ms. Jevremović and her family relocated their residence and hired 24-hour security to guard their home. Ms. Jevremović thus respectfully seeks to avoid providing her personal address in court filings, so she will not be forced to relocate again.

3. Defendant is an individual who, upon information and belief, resides at 10 Teak Lane, Princeton, NJ 08540.

¹ The names of AURA’s members have been disclosed in a separate filing with the Court under seal.

NATURE OF THE ACTION

4. This is an action for defamation in the form of libel in connection with Courville's publications and republications to the Internet of or about Jevremović and AURA. With respect to facts alleged herein on information and belief, Plaintiffs and their undersigned attorneys are informed and believe that those facts are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery, because, among other reasons, evidence to support those facts is exclusively in Defendant's possession.

JURISDICTION AND VENUE

5. Subject matter jurisdiction is appropriate to this Court under 28 U.S.C. § 1332 because complete diversity exists amongst the parties and the amount in controversy exceeds the jurisdictional minimum.

6. Venue is appropriate in this District under 28 U.S.C. § 1391(b)(1), (b)(2), and (c)(1) because Courville resides in this District and Courville published a substantial number of actionable statements to the Internet from this District.

ALLEGATIONS COMMON TO ALL CAUSES OF ACTION

7. Defendant is a New Jersey attorney, licensed in 2021 after graduating from The University of Pennsylvania School of Law in 2020. Courville worked at Winston Strawn briefly before she and the firm parted ways over Courville's use of social media. On her LinkedIn profile, she identifies herself as President of the defunct Life Treasures Foundation, Inc., and describes her profession as "Legal Commentary on YouTube/Social Media Law."

8. In July 2020, Courville began to affiliate herself with the "Free Britney" cause célèbre, which criticized the institution of a conservatorship on celebrity-musician Britney Spears. Courville uses variants of the handle "that surprise witness" on her social media accounts. She reports becoming "obsessed" and using her newfound "legal expertise" to

interpret the associated law, pleadings, and court opinions and orders. She spread this information online via videos, photos, and text commentary. As the “Free Britney” cause célèbre gained mass media attention, Courville was invited to give interviews as an attorney among the Britney Spears fanatics. Courville received attention, praise, and admiration from strangers in reaction to her publications regarding the Britney Spears litigation.

9. However, as Britney Spears’ conservatorship was terminated, Courville began to receive less attention. She looked for other celebrities onto whom to latch and began inventing scandal where none existed. Courville found a celebrity in entertainer Brandon “Bam” Margera (“Margera”) and created a scandal concocting ersatz villains out of Ms. Jevremović and her wellness supplements and healthcare solutions software business, AURA.

10. In 2019, Ms. Jevremović founded AURA to help individuals suffering through mental health crises, including addiction. AURA uses technology to scale affordable, high-quality mental health treatment services. The Company supports mental health professionals using the technology to track patient progress of people undergoing mental health treatment, *inter alia*, by recording and analyzing biometric data and providing the information to treatment providers from therapy sessions, connecting patients to therapists via telehealth, guiding users through grounding exercises and coping strategies, providing instructions in mindfulness and meditation, and using virtual reality (a.k.a. “VR”) to, *e.g.*, assist with exposure therapy, a technique guided by licensed therapists to extinguish an anxiety response. The Company also produces vitamins/supplements for brain health and mood support.

11. AURA developed a community of adherents, and it has succeeded in garnering an initial round of investor funding for its development and launch. Through AURA, Ms. Jevremović supplies mental health assistance tools to numerous individuals free of charge in order to receive feedback, refine her tools, and develop a viral, word-of-mouth buzz surrounding

the product. To that end, AURA additionally provides services without charge to celebrities, influencers, and persons in the public eye as well as individuals with no public presence as a community social service. Plaintiffs were successful in this regard until Courville began her social media campaign against them.

12. One such recipient of AURA's free-of-charge services was Amanda Rabb ("Rabb"), an unhoused, drug-addicted woman residing in Los Angeles' notorious Skid Row who turned to sex work to fund her addiction. AURA provided \$250,000 to be used by Rabb for a year of mental health treatment (including detoxification), seven months of in-patient residential care, three months of full-time out-patient treatment while residing at a sober living facility, and two months of job placement training and reduced therapy to gradually integrate Rabb back into society as a productive, healthy member. Rabb was also given the opportunity to use AURA's products at no cost in conjunction with her treatment and therapy under the supervision of health care professionals. Ms. Jevremović personally funded the majority of Rabb's treatment, including drawing \$212,500 from a personal line of credit, supplemented by \$37,241 in donated funds.

13. Sadly, on Sunday, May 9, 2021, staff at the Desert Hope Treatment Center ("Desert Hope") found Rabb unresponsive in her bed and unsuccessfully performed CPR. An AURA employee contacted the Clark County Coroner's Office, requesting information regarding Rabb's death. Desert Hope indicated that Rabb only had Tylenol in her system – a fact verified by a representative of the Clark County Coroner, Dr. Paul Uribe. Dr. Uribe added that Rabb's death resulted from natural causes, likely from multiple causes including physical trauma previously endured while abusing illicit substances and harm caused directly by the substances she had formerly abused. Rabb's formal autopsy report states that she died from cardiac arrhythmia with hypertension, obesity, and schizophrenia as contributing factors.

14. Celebrity entertainer Margera and his wife, Nicole Boyd-Margera (“Boyd-Margera”), took an interest in AURA in the Spring of 2021. Margera has starred in blockbuster Jackass movies and popular television programs. Margera fought a longtime battle with substance abuse and witnessed numerous members of his inner-circle fight addictions over the previous two decades. Because of his background, Margera and Boyd-Margera initially sought to provide their support to Plaintiffs’ worthy cause. However, Margera relapsed soon thereafter, and Margera’s family approached Ms. Jevremović for intervention assistance.

15. On or about June 7, 2021, an Arizona court imposed a one-year temporary guardianship over Margera in connection with his diagnosed mental disorder. Margera’s family and friends implored Ms. Jevremović to serve as Margera’s temporary guardian. Ms. Jevremović agreed and took on the responsibility for Margera’s care and treatment, effected by court order. Ms. Jevremović was given no control over or insight into Margera’s finances. Also, despite the fact that the Ms. Jevremović is statutorily permitted to collect reasonable sums for her services as guardian, Ms. Jevremović has received no compensation whatsoever, directly or indirectly, in association with her status as Margera’s guardian.

16. Margera began treatment at a drug rehabilitation facility in Florida. However, Margera left this facility, and his whereabouts were unknown for several weeks while he engaged in risky and self-destructive behaviors consistent with his mental disorder. Margera was found and involuntarily placed in the custody of another drug rehabilitation facility. Ms. Jevremović assisted in helping Margera obtain further treatment in Florida. After the court-ordered guardianship terminated, Margera requested that Ms. Jevremović continue to serve as his “Health Care Agent,” a role in which she assists Margera with his medical care related to his mental health treatment and recovery.

17. Margera’s guardianship and substance abuse treatment received press coverage. Courville pried into Margera’s public records – discovering Ms. Jevremović’s involvement – and formulated a conspiracy theory. Courville began publishing videos, photos, and text commentary regarding Margera, labeling her publications “#FreeBam,” a reference to Margera’s stage name, “Bam.” On her Instagram account, Courville proudly calls herself a “conspiracy theorist.”²

18. Courville’s theory is that Margera’s family, friends, and business partners used a court-imposed guardianship to remove Margera as an obstacle to co-opting his assets. Courville baselessly asserts that Ms. Jevremović is committing and assisting in the commission of criminal acts and that Ms. Jevremović is dishonest and promulgates lies. In formulating conspiracies about Ms. Jevremović, Courville further latched onto the publicity surrounding Rabb, her treatment, and her ultimate death. Courville published videos, photos, and textual commentary in which she falsely accused Ms. Jevremović of criminal acts and dishonesty. Springing from Courville’s publication of these false allegations, Courville has inspired a throng of similarly celebrity-obsessed fans to harass, threaten, and attack Ms. Jevremović, her family, and her business.

19. Courville has published to the Internet Ms. Jevremović’s social security number, date of birth, home phone number, and family members’ addresses, among other pieces of highly personal and sensitive information. Additionally, Courville published information regarding Ms. Jevremović’s family – including pictures of her husband and mother-in-law – as well as the identities of Ms. Jevremović’s sisters and details of their medical histories. After being besieged

² Courville published an illustration on or about May 31, 2022, in which a “conspiracy theorist” is defined as “[s]omebody who figures out *the truth* before most people” (emphasis added), and she commented on the illustration with “#FreeBam.”

in their home in Washington state by Courville's devotees, Ms. Jevremović and her family relocated to California for their safety and have hired a round-the-clock home security detail.

20. Moreover, Courville's defamatory statements of or about Plaintiffs directly interfered with AURA's second round funding, causing potential investors actively involved in funding discussions to retreat. Additionally, Courville's defamatory statements of or about Plaintiffs have interfered with AURA's launch of a new product line of vitamin supplements, directly resulting in order cancellations and the withdrawal of marketing affiliates.

21. Courville has expressly invited the present lawsuit, believing that Ms. Jevremović cannot defend herself because to do so would be prohibitively expensive, stating:

Lima, if you think you're going to be in a lawsuit with me, I dare you to sue me in a lawsuit because I'm a lawyer. I will pay zero dollars for law services, and you will have to pay lawyers who are at least as smart as me to fight against me, which is not cheap; it is very expensive to hire lawyers who are as smart as me. So, have at it if you motherfucking think that you have a snowball's chance in the goddamn fireplace, but you don't.

Brittany Jeream Courville (That Surprise Witness TV), *Is Bam Free? | Lawyer Reacts*, YouTube (May 18, 2022), https://www.youtube.com/watch?v=852cOZLBNZA&t=518s&ab_channel=ThatSurpriseWitnessTV. Courville will now receive what she requested.

ACTUAL MALICE

22. Courville knew and ignored the fact that no evidence demonstrated Ms. Jevremović to be dishonest, and knew and ignored the fact that no evidence demonstrated Ms. Jevremović to be a criminal.

23. Courville had a preconceived story line, *i.e.*, that Ms. Jevremović must be acting improperly, prior to learning any facts regarding Ms. Jevremović, and Courville purposefully twisted and misrepresented information in order to fit her preconceived story line.

24. Courville was aware that her statements of fact were untrue based on their inherent improbability.

25. Courville took steps to deliberately avoid learning the truth regarding Ms. Jevremović, despite that such information was available to her.

26. Courville's videos air advertisements from which she personally profits. Thus, Courville is incentivized to publish and disseminate shocking materials, materials regarding celebrities, and other materials designed to maximize the views received by the commercials that play during her videos.

27. Courville further solicits and collects donations directly from viewers during her live broadcasts *via* YouTube, and Courville operates a site to solicit donations on gofundme.com. Courville has [a Patreon account](#) (an organization that provides users tools with which to fund-raise) in which she has 148 paying subscribers and where she solicits additional funds for in-depth videos on her conspiracy theories. Courville also uses her social media accounts to drive income through the sale of branded merchandise. Courville thus drives her income via defamatory statements.

28. On July 15, 2022, Plaintiffs contacted Courville in writing to demand retraction of defamatory statements. To the extent Courville disclaimed any of her defamation, her attempts were patently pretextual and obviously insincere. On July 22, 2022, Plaintiffs again contacted Courville in writing to identify further defamatory statements and to demand their retraction. No retraction issued.

FIRST COUNT

LIBEL

(By Plaintiff Lima Jevremović)

29. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 28 as though fully set forth herein.

30. On May 30, 2022, Courville published via Instagram the [statement](#):

Lima [Jevremović]. . . LIED ABOUT [AMANDA’S] CAUSE OF DEATH TO MILLIONS of people.

31. This statement is defamatory as it expressly impugns Ms. Jevremović’s honesty and is wholly false.

32. On April 19, 2022, Courville published an [image](#) of Ms. Jevremović reading Amanda’s cause of death (as per the information obtained by an AURA employee from the Clark County Coroner) from a YouTube video to Instagram with the caption:

I requested the autopsy report and lima is lying in this video. There was NO evidence of traumatic injury. There was LOTS [sic] of medication in her system (not ‘only Tylenol’). The cause of death has nothing to do with ‘seizure disorder’, but rather cardiac arrhythmia. I’ve posted on [Instagram]about it.

33. This is defamatory insofar as it falsely accuses Ms. Jevremović of dishonesty, whereas Ms. Jevremović in fact accurately conveyed the information that the Clark County Coroner had conveyed to AURA.

34. On April 19, 2022, Courville published [photos](#) of Amanda Rabb’s “Report of Investigation” record obtained from the Clark County Coroner, and Courville published comments stating:

Two of Lima’s lies EXPOSED: (EXCLUSIVE AUTOPSY REPORT) 1. WAYY [sic] more than just Tylenol in her system (including cannibinoids [sic] and barbiturates) 2. Cause of death is NOT ‘seizure disorder’ or ‘caused by beatings and rap[e]s) [sic], but rather, ‘cardiac arrhythmia’. #AmandaRabb #FreeBam #LIARS.

35. These false statements are defamatory insofar as they impugn Ms. Jevremović’s honesty.

36. On April 19, 2022, Courville published [a video](#) of Ms. Jevremović reading Amanda’s cause of death (as per the information obtained from the Clark County Coroner) from a YouTube video to Instagram. Courville commented on the video, stating:

So lima from @meetaura BOLD FACE LIED to [Mr. Laita] and [YouTube] followers when she said Amanda Rabb's cause of death was 'seizure disorder'. I have reached out twice to [Mr. Laita] for comment, and he has ignored me. Why did lima lie?? #FreeBam #AmandaRabb.

37. This false statement is defamatory insofar as it impugns Ms. Jevremović's honesty.

38. On April 3, 2022, Courville published an [image](#) on Instagram which purports to list biographical information about Margera, including his putative net worth (\$20 Million). Courville commented on the image:

According to @distractify, [Margera] is worth \$20 million. Now who would have an incentive to want to control that money and who would be in a position to do so 😏😏😏 but what do I know I'm just a cOnSpIrAcY tHeOrIsT 😏😏😏😏 #FreeBam.

Another commenter states:

20 million now, soon to be much less, but it'll all be 'legit,'

to which Courville responds:

but a certain someone will have fresh lips, Botox, and a BBL watch.

Based on her other comments using the term "#FreeBam," her audience would reasonably interpret Courville's comments here to reference Ms. Jevremović – in fact, people did comment in response who understood the messages to reference Ms. Jevremović.

39. These statements are defamatory insofar as Courville falsely characterizes Ms. Jevremović as depleting Margera's money rather than assisting with treatment for a substance abuse disorder. Such statements are defamatory as they falsely impute a motive to Ms. Jevremović, which most people would find condemnable. Courville further reveals her insincerity with respect to the "conspiracy theory" label and "conspiracy theorist" moniker: a commenter states:

Please stop with conspiracy theory that have proof and makes sense. You give us true conspiracy theorist who talk about nonsense with no proof look brilliant😁😁😁😁. Keep up the good fight

and Courville responds with

😁😁😁 I just say it so they can't use that stupid sh[i]t against me. The smart people know when they're looking at evidence in the face. The ones who know, know 🤩💖.

40. Courville thus disclaims language that implies her statements are anything but sincere.

41. On March 30, 2022, Courville published to Instagram an [excerpt](#) of a YouTube video in which Ms. Jevremović and Larry Rabb, Amanda Rabb's father, describe how they managed to transfer Amanda from jail to a drug rehabilitation facility through the use of Court Ordered Treatment under California law. Pausing and speaking over the video at the one-minute and fifteen-second timestamp, Courville states that Amanda's public defender is not supposed to:

help you push your scam conservatorship through.

42. This statement is defamatory per se insofar as it accuses Ms. Jevremović of a scam with reference to attempting to impose an LPS conservatorship on Rabb; this imputes criminality or at least immorality and is thus defamatory.

43. On May 7, 2022, Courville published a [photo](#) to Instagram picturing Margera's costars from his television show and movies performing a stunt, and Courville captioned the photo:

[PEOPLE] . . . are mad that I'm uncovering a criminal conspiracy

And

#FREEBAM.

She further published a comment on the photo stating,

Let the #conspiracytheories roll #freebam.

44. These statements were defamatory as they falsely imply that Ms. Jevremović, as a person Courville repeatedly identifies as responsible for Margera's confinement, is a criminal and engaged in a criminal conspiracy.

45. On May 6, 2022, Courville published a [picture](#) of Margera to Instagram, overlaid with an anonymous person's statement criticizing Courville's publications:

the whole #freebam thing is so weird and i [sic] strongly believe that [Courville] is a conspiracy theorist. if [sic] she was an actual lawyer[,] wouldn't she actually be busy? sorry [sic] i'm [sic] not buying it

Courville published a comment in response:

I AM a conspiracy theorist. I have a theory that this is a criminal conspiracy. So they're right! #freebam.

46. This statement is defamatory as it implies that Ms. Jevremović, as a person whom Courville repeatedly identifies as central in Margera's treatment, is engaged in a criminal conspiracy.

47. On May 4, 2022, Courville published an [image](#) to Instagram containing mostly text; the text is a republication of a comment previously made by Courville, which of relevance includes:

. . . I am a licensed attorney who believes [Margera]'s constitutional rights have been violated. Based on my education, knowledge, and experience, he has been set up by a group of criminal co-conspirators for financial purposes not in [Margera's] best interest. . . . #freebam SPREAD THE WORD.

48. This statement constitutes defamation insofar as it implies that Ms. Jevremović, as a person whom Courville repeatedly identifies as central in Margera's treatment, is engaged

in a criminal conspiracy and is attempting to co-opt Margera's assets. Further, Courville encourages her audience to further publish her statements.

49. On May 4, 2022, Courville published an [image](#) on Instagram regarding Margera, and a user, "pettyhearst," commented thereupon stating:

I've been a [Margera] fan for 20 years, and his parents are good people who want the best for their son. While I personally believe conservatorships are never the answer and forced treatment is harmful, if it was just them in charge[,] I would at least have peace of mind that there is no malicious intent. But they aren't in charge[;] Lima is, and she's a snake oil salesman with blood on her hands. She's clearly adept at manipulation, and I have no doubt she is manipulating [Margera's parents].

50. Courville published a reply directly to this statement expressing agreement:

bingo.

51. This statement is defamatory insofar as Courville affirmed the false statements made by the anonymous commenter, thus adopting those comments as her own. These statements assert that Ms. Jevremović is manipulating persons for her own gain (impugning Ms. Jevremović's honesty) and imply that Ms. Jevremović is not acting in Margera's interest, that Ms. Jevremović is responsible for Rabb's death ("blood on her hands" – in conjunction with Courville's other defamatory statements with respect to Ms. Jevremović and Rabb, this is a reference to Ms. Jevremović allegedly being at fault for Rabb's death), and that Ms. Jevremović has malicious intent.

52. On April 27, 2022, Courville published on Instagram an [image](#) showing a digital message sent to her in which Courville is criticized for spreading falsehoods (i.e., "Irresponsible videos with imagined facts can be very damaging to others"). Courville captioned the image

SUE ME

and published a comment on the image, stating:

The only facts that were imagined came from Lima Jevremović's lying ass mouth.

53. This false statement is defamatory insofar as it impugns Ms. Jevremović's honesty. Courville further published a comment to this image, stating:

if telling the truth is 'damaging to others' and those others are criminals, SO BE IT.

54. This statement is defamatory insofar as it implies that "others" is Ms. Jevremović and thus falsely implies that she is a criminal (the "others" referenced is clearly a reference to Ms. Jevremović, in context).

55. On April 27, 2022, Courville published on Instagram another [image](#) showing a portion of the message sent to her. Courville published a comment associated with the image that reads in relevant part:

Or is it maybe because the public record doesn't agree with the fake[,] imaginary tale surrounding Rabb's death that [the message sender] wants us to believe??.

56. This statement is defamatory as it impugns Ms. Jevremović's honesty by implying that she fabricated a "fake[,] imaginary tale" to mislead people. In a separate comment, Courville further answers a question about Ms. Jevremović's description of HIPAA's application to Rabb, stating:

because they lie.

57. This is defamatory as it is false and expressly impugns Ms. Jevremović's honesty.

58. On April 26, 2022, Courville published to Instagram a [screenshot](#) showing the "gofundme" donation page for Rabb's treatment, which then indicated that no new donations would be accepted. Courville commented on this photo with the statement:

Thanks for taking down your fraudulent fundraiser lima!

59. This statement is defamatory as it falsely imputes criminality to Ms. Jevremović, expressly accusing her of fraud.

60. On April 25, 2022, Courville published on Instagram an [excerpt](#) from a Complaint previously filed by Margera against others affiliated with his television and film career. A commenter stated in response:

You discover so much more each days [sic] that goes by.. I don't trust any of them.. If this man does not come out of this [conservatorship,] they will eventually [k]ill him with prescription drug[s] or disguise street drugs as prescription drugs[;] who knows.. If [Britney Spears] would not be out of this[,], she would prob[ably] be de[a]d by now.. This man need[s] to be saved and free now.. #freebam.

In response, Courville states:

the plan is to end his life. I'm convinced of it. #savebam.

61. This statement is defamatory insofar as it alleges that those involved in “the plan” are seeking to kill Margera; in context with Courville’s statements regarding Ms. Jevremović being central to Margera’s treatment, one can reasonably infer that Courville is falsely referencing Ms. Jevremović as planning to kill Margera.

62. On April 25, 2022, Courville published to Instagram a [screenshot](#) showing that the “Donate now” button was still present on the “gofundme” donation page for Rabb’s treatment. Courville commented, asking Gofundme

can you return the funds that have been fraudulently collected from donors on this fundraiser?

and stated,

many people have reported this fraudulent fundraiser and your organization has taken no action.

Elsewhere, Courville states that

we’ve reported [fraud] a lot

63. These statements are defamatory as they falsely accuse Ms. Jevremović of criminal behavior – namely, fraud.

64. On April 19, 2022, Courville posted an [image](#) comprising text with the tip line for human trafficking from the National Human Trafficking Hotline, and Courville commented: “#FreeBam.” Courville specifically highlighted the phone number and the text stating,

REPORT A TIP with information on potential human trafficking activity.

65. Courville further added a second photo, depicting a cell phone call to a phone number with five minutes having elapsed, the implication being that Courville had called to report Margera as being trafficked to the National Human Trafficking Hotline. A commenter asks in response:

There [are two] different numbers?!

to which Courville answers:

yeah[,] there’s a few[,] I called a different tip line[,] but you can call either one.

66. This is defamatory because Courville implies that Margera is being trafficked, a criminal act, and in the context of her other statements used in connection with the “#FreeBam” tag, it is clear that she views Ms. Jevremović as central to this effort. In the context of her statement that she has called to report Margera’s situation as human trafficking and in light of her explicit instructions to a commenter to call, Courville intends this statement to be understood sincerely.

67. On April 19, 2022, Courville published an [image](#) on Instagram containing a short conversation between Courville and a commenter. The commenter accurately stated:

[Margera is] not under a conservatorship[:] he’s under a guardianship – big difference.

68. As recounted in the discussion of Margera above, he was subject to a guardianship imposed in Arizona, and at no relevant time has a conservatorship been imposed. Nonetheless,

Courville invokes her credentials, suggests she holds expertise, again provides an inaccurate interpretation of the law, and solicits viewers for her advertisement-supported videos:

are you a lawyer? Because I am. It's not different. It's exactly the same. Different states just call it different things. Please feel free to check out my Bam Margera playlist on YouTube for more info!

In response, a commenter remarked:

Every state is so different that I think these people use it to confuse people. I wonder if it would help if it was more uniform across the United States?

Courville, apparently drawing upon her self-avowed lawyerly expertise, explains:

it's to confuse people so the criminals can keep crim[e-]ing.

69. This is defamatory insofar as, in the context of discussing Margera, it falsely states effectively that the guardianship system is a criminal tool, and thus by implication that Ms. Jevremović, as Margera's guardian, must be a criminal.

70. On April 19, 2022, Courville published on Instagram a [screenshot](#) of a conversation between unidentified persons regarding Margera; Courville commented, describing "[L]ima [J]evremović" as an "alleged trafficker." On April 19, 2022, Courville published on Instagram [screenshots](#) of excerpts from a tabloid story about Margera's recovery, with a section of the article highlighted. Courville commented on the screenshot regarding Margera's recovery, in relevant part, by stating: "#FreeBam" and "#EndHumanTrafficking."

71. These statements are defamatory as they imply that Ms. Jevremović is trafficking Margera. While these statements might ordinarily be readily understood as hyperbole, Courville's repeatedly holding herself out as a legal expert and her repeated emphasis of her use of legal language in its technical sense would reasonably lead a significant portion of her audience to understand the implications of these statements literally.

72. On April 18, 2022, Courville published a [screenshot](#) of a highlighted excerpt from an article discussing the application of Iceland law and whether Margera's and his wife's marriage is legally recognized. A commenter on this image asked:

where are his parents?

to which Courville responded:

helping the criminals [sic] girl.

73. This statement is defamatory insofar as Courville's constant association of Ms. Jevremović with Margera's treatment naturally leads Courville's audience to understand "girl" in this context to reference Ms. Jevremović; these false statements are defamatory insofar they assert that Ms. Jevremović is a criminal, which she is not.

74. On April 3, 2022, Courville posted a [screenshot](#) of an excerpt of a celebrity tabloid article to Instagram, in which she highlighted a portion of the title stating, "Margera Used To Have A \$45 Million New Worth"; Courville commented on the photo, saying:

I heard forced rehab is expensive... I learned that from Lima from @meetaura. Who now has @bam__margera in a forced rehab. WhT are the chances!! That's just my conspiracy theory lol 🤪 #FreeBam.

75. By linking the cost of rehabilitation, as described by Ms. Jevremović, to the supposed depletion of Margera's net worth, Courville is falsely characterizing Ms. Jevremović as depleting Margera's money rather than assisting with treatment for a substance abuse disorder. Such a statement is defamatory as it falsely imputes a profit motive to Ms. Jevremović which most people would find condemnable.

76. On March 30, 2022, Courville published to Instagram a [screenshot](#) of comments made to Instagram; a commenter asked:

forced incarceration, experimenting on homeless & celebrity cash cows to fund her treatment centers? If im [sic] wrong on anything[,] please [let me know.]

Courville responded:

I mean... that's my impression, so if you're wrong[,] I am too.

77. Courville thereby explicitly adopted the commenter's false statements. Ms. Jevremović does not engage in experiments on the homeless and has no treatment centers; further, the pejorative term "celebrity cash cows" implies that Ms. Jevremović is exploiting celebrities for money. Such false statements are defamatory as they indicate dishonesty and insofar as people hold low opinions of those who exploit others.

78. On April 4, 2022, Courville published to YouTube a [video](#) in which she defames Ms. Jevremović. At 27:39, Courville describes Margera's transfers between treatment facilities and states:

Honestly, some of it looks criminal. Now I'm a lawyer, but what do I know. It looks criminal to me.

79. This statement defames Ms. Jevremović insofar as Courville repeatedly identifies Ms. Jevremović as responsible for Margera's treatment, and insofar as Courville, invoking the authority she commands as a lawyer, describes aspects of Margera's treatment as criminal.

80. On July 15, 2022, Courville published to YouTube a [video](#) in which she reacts to Ms. Jevremović's public statements addressing, inter alia, Courville's harassment ("the relentless harassment, leaking all of my private information all over the internet, threats to my family and clients, constantly reporting my social media accounts and businesses and the over 14,000 emails that have cluttered my inbox"). At 05:05 Courville states

I also know Lima [is] a liar.

81. This is defamatory insofar as Courville expressly impugns Ms. Jevremović's honesty.

82. Later in the same [video](#), at 26:08, Courville addresses the discrepancy between Ms. Jevremović's description of Rabb's cause of death and the official autopsy report and states:

[Ms. Jevremović] can't keep track of her story. And that's what happens when you lie; you have to keep track of the lies you told.

83. This is defamatory insofar as it expressly characterizes Ms. Jevremović's statements as lies.

84. On July 8, 2022, Courville published to YouTube a [video](#). At 6:10, she states:

I do not say theories without being very explicit that it is my opinion or my belief or my suspicion. I never say anything as if it is a fact when I don't know it to be a fact.

85. Courville thus emphasizes that her statements are accurate and factual. At 15:59, Courville describes herself as

the woman who dared use her, volunteer her time to help [Margeria] out of a literal human trafficking situation

86. This is defamatory insofar as it characterizes Ms. Jevremović's imposition of a guardianship as human trafficking, a crime. While such statements might ordinarily be susceptible to an interpretation as hyperbole, Courville disclaims hyperbole by use of the term "literal," and she makes clear that if she did not intend for this statement to be taken literally, then she would have been "very explicit that it is my opinion or my belief or my suspicion," and she would "never say [this statement] as if it is a fact if [she didn't] know it to be a fact."

87. Ms. Jevremović's reputation and business endeavors have been negatively impacted, and she has unduly suffered humiliation, emotional distress, anger, embarrassment, sadness, frustration, fear, loss of income, chagrin, severe anxiety, stress, shame, mortification, hurt feelings, sleeplessness, and physical manifestations thereof resulting from Courville's above-described actions. Ms. Jevremović's associated damages are in an amount to be proven at trial, but in no event less than the jurisdictional minimum of this Court.

88. Courville knew or should have known each of these statements to be false at the time the statement was made, and thus, Courville acted with actual malice sufficient to support an award of punitive damages.

89. Courville intentionally and maliciously made the above-quoted false statements over several months in an attempt to benefit herself by gaining more online attention and compensation for more views on her social media publications. Courville made these false statements in a wanton and willful disregard of Ms. Jevremović's rights. Courville knew or should have known at the time that she made the statements that serious harm would arise from Courville's conduct, and Courville, with knowledge of the harm caused, continued such conduct. Courville's outrageous, egregious, and exceptionally wrongful behavior should be punished in the form of punitive damages to deter her from similar wrongful conduct in the future.

SECOND COUNT

LIBEL

(By Plaintiff AURA)

90. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 89 as though fully set forth herein.

91. On April 27, 2022, Courville published to Instagram an [image](#) showing a digital message sent to her in which the message-sender criticizes Courville for spreading falsehoods. An anonymous commenter asked,

When has Lima Jevremović [sic] . . . ever up held [sic] HIPPA [sic]?

Courville responded:

never not once [sic].

92. This statement is defamatory insofar as it references Ms. Jevremović's work on behalf of AURA, and it asserts that Ms. Jevremović, and by extension, AURA, violate the Health

Insurance Portability and Accountability Act (“HIPAA”). Because AURA’s products are used in mental health treatment, they must (and do) comply with HIPAA. Courville’s statements are defamatory *per se* insofar as they falsely allege that AURA is irresponsible with its client’s private information and that AURA does not follow black-letter law. Such statements would damage AURA’s esteem and reputation amongst patients, healthcare practitioners, investors, and others, and would lead third parties to think that AURA is incompetent in its business or engages in misconduct in its business operations.

93. On April 27, 2022, Courville republished an [image](#) containing another’s statements to Instagram regarding Rabb, Margera, and Ms. Jevremović; an anonymous commenter asked:

Are [Ms. Jevremović and Aura,] using homeless people with addictions to experiment on them for their [YouTube] channel?

and Courville unequivocally affirmed the commenter’s statement:

yes.

94. By affirming the commenter’s statement, Courville effectively adopted the statement as her own. This false statement is defamatory as it explicitly states that Ms. Jevremović and AURA are experimenting on homeless individuals, implying that they are doing something inhumane. It further implies that Ms. Jevremović and Aura are dishonest insofar as Courville’s statement contradicts Ms. Jevremović’s stated reason for providing care to Rabb.

95. On March 31, 2022, Courville published to Instagram an [excerpt](#) from a video in which Ms. Jevremović read Rabb’s cause of death as a seizure disorder. Courville pauses and adds commentary, including, at 0:10; Ms. Jevremović states:

Rabb never had seizures prior to being homeless.

Courville comments and states:

But I think another way of saying that is she never had seizures prior to using AURA.

96. Courville thus seeks to falsely imply that AURA's products caused Rabb's seizures and potentially caused her death.

97. On March 31, 2022, Courville published on Instagram a [photo](#) of Rabb wearing virtual reality headgear and participating in a "Virtual Reality Exposure Therapy Session using AURA." A person commented on the photo with interest in the virtual reality-based treatment, and Courville responded:

the issue is that Rabb was forced to do this treatment under threat of going to prison. She was set up against her will with the help of the government do be used as a test subject and marketing tool. I agree with you completely that it 'seems cool'. What's not cool is taking away someone's choice for their own treatment.

98. This statement is defamatory insofar as it falsely states that patients have the AURA system forced upon them as a test-subject; such a statement carries negative implications about AURA as people are generally opposed to being forced to test healthcare treatments.

99. On April 1, 2022, Courville published an [excerpt](#) from a program for a virtual reality conference which included Ms. Jevremović and her then-company, which worked with virtual reality in jail and prison settings. Courville commented on the image:

Seems like Lima has BEEN looking for a way to use experimental virtual reality apps on vulnerable populations that she views as 'problematic'. #InvestigateAURA #FreeBam #RabbRabb.

100. This statement is defamatory insofar as it characterizes Ms. Jevremović and AURA as experimenting on vulnerable populations whom Ms. Jevremović purportedly views as "problematic" and insofar as it contradicts Ms. Jevremović's stated reasons for working with those suffering from mental health disorders (thereby impugning her honesty); such a characterization is highly offensive and falsely imputes a motive to Ms. Jevremović and to AURA which most people would find condemnable.

101. On March 30, 2022, Courville published another [excerpt](#) from a video in which Ms. Jevremović describes the use of Aura products in connection with Rabb's treatment. Ms. Jevremović explains that AURA provides its products at no cost and uses the data collected for research purposes, and Rabb would have the opportunity to serve as a case study. Courville commented on the video:

Rabb did not consent to being used as a research object. She was court ordered into a conservatorship after Lima, mark Laita, and Rabb's dad SET HER UP. This same woman petitioned to put Bam into a conservatorship. #FreeBam #RabbRabb #InvestigateAURA

102. These statements are defamatory as they falsely state that Ms. Jevremović and Aura forced Rabb to test AURA products – people are generally opposed to being forced to test healthcare tools. Such a statement negatively impacts AURA's reputation.

103. On February 22, 2022, Courville published to YouTube a [video](#) in which she defames Ms. Jevremović and AURA. At 49:55, Courville falsely states:

[Ms. Jevremović] forces people by court order to use [AURA's] tools.

104. This statement is defamatory insofar as it falsely states that Ms. Jevremović on behalf of AURA imposes conservatorships on people as a means to force people to use AURA's tools (from which AURA and Ms. Jevremović would purportedly profit); people will generally understand this statement to be defamatory insofar as forcing guardianships and conservatorships on people for the purpose of generating profits is generally condemnable behavior.

105. AURA's reputation has been negatively impacted due to Courville's above-described actions; AURA has lost substantial investments, opportunities, and income resulting from Courville's defamation.

106. Courville intentionally and maliciously made the above-quoted false statements over several months in an attempt to benefit herself by gaining more online attention and compensation for more views on her social media publications. Courville made these false

statements in wonton and willful disregard of AURA's rights, with knowledge of their falsity or reckless disregard for whether the statements were true. Courville knew or should have known at the time she made the statements that serious harm would arise from Courville's conduct, and Courville, with knowledge of the harm caused, nevertheless continued such conduct unabashedly. Courville's outrageous, egregious, and exceptionally wrongful behavior should be punished in the form of punitive damages to deter her from similar wrongful conduct in the future.

107. These false statements expose AURA and its CEO, Ms. Jevremović, to hatred, contempt, and the loss of the good will and confidence felt toward them by others.

108. Furthermore, these false statements have a tendency to injure, and did in fact injure, Plaintiffs' business operations in the addictions recovery and mental healthcare industry, including but not limited to their use of therapist-guided exposure therapy implementing virtual reality technology and telehealth solutions.

109. These statements are entirely false. As a result of Courville's publications, Plaintiffs have suffered reputational harm in an amount to be proved at trial.

110. As a result of Courville's publications, AURA has lost business opportunities in an amount to be proven at trial.

111. Courville's conduct in publishing and republishing the above statements was actuated by actual malice and/or accompanied by a wanton and willful disregard of the effect her statements would have on Plaintiffs' reputations, which foreseeably might be harmed by Courville's republications. Such conduct entitles Plaintiffs to an award of punitive damages under N.J.S.A. 2A:15-5.9, *et seq.*, to both punish and deter Courville's wanton conduct in an amount to be proven at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for Judgment as follows:

1. For general damages according to proof, but not less than \$75,001;
2. For compensatory damages according to proof;
3. For special damages for damage to reputations, losses of business opportunities, and losses of investment opportunities according to proof, but not less than the jurisdictional minimum of this Court;
4. For the maximum available punitive damages per Plaintiff per cause of action;
5. For a permanent injunction to remove all statements and publications adjudged libelous;
6. For pre- and post-judgment interest as allowed by law;
7. For costs of suit and such other and further relief as this Court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury for all matters triable.

Respectfully submitted,

s/ Sherri A. Affrunti

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Attorney for Plaintiffs Lima Jevremović and
Autonomous User Rehabilitation Agent, LLC

Dated: June 6, 2023

NEW JERSEY DISTRICT COURT LOCAL RULE 11.2 CERTIFICATION

I, Lima Jevremović, on my own behalf and on behalf of Autonomous User Rehabilitation Agent, LLC (“AURA”), hereby declare the following:

1. I am a Plaintiff in the present case, a citizen of California and the United States of America.
2. I am also the CEO of Autonomous User Rehabilitation Agent, LLC and, as such, I am authorized to make statements on the Company’s behalf.
3. I have fully reviewed the foregoing Amended Complaint;

I hereby certify that the matter in controversy in the foregoing Amended Complaint is not the subject of any other action pending in any court, or of any pending arbitration or administrative proceeding. I certify under penalty of perjury that the foregoing is true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Executed on June 6, 2023

s/ Lima Jevremovic

Lima Jevremović, on my own behalf, and
on behalf of Autonomous User
Rehabilitation Agent, LLC

CERTIFICATE OF SERVICE

I hereby certify that Defendant Brittany Jeream Courville is being served with the foregoing Amended Complaint *via* her counsel of record through the Court's ECF system.

s/ Sherri A. Affrunti

Sherri A. Affrunti, Esq.

Dated: June 6, 2023